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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

JABBAR SACHET AL-KHAFAGI,

Plaintiff,

v.

CHARLES C. SUNG, MD; (FNU) CRITES,
Oregon State Correctional Institution (OSCI),
Registered Nurse (RN); LORETTA IRVING,
(OSCI) Medical Services Manager;
CHRISTOPHER DIGIULIO, Oregon
Department of Corrections (ODOC) Medical
Director; JOE BUGHER, ODOC Health
Services Administrator; and JOHN AND
JANE DOES 1-20,

Defendants.

Case No. 2:19-CV-00669-MO

JOINT CASE MANAGEMENT SCHEDULE

JOINT PROPOSED CASE MANAGEMENT SCHEDULE

In accordance with the Court's Order at Dkt. #82, Plaintiff's counsel and Defendants' counsel have conferred and agreed to propose the case management deadlines set forth below.

The parties have substantially exchanged paper discovery to include prior pleadings and papers, and we anticipate several Defendants' and Plaintiff's depositions in the coming weeks as schedules permit.

The parties propose the following events and dates:

- Extend the close of discovery to 11/17/2022 given the recent appointment of Plaintiff's counsel; and due to the extent of document discovery and the need for additional depositions (90 days from the filing of this report with the courtroom deputy clerk).
- Extend the close of expert witness disclosures to 12/16/2022 (30 days after the close of discovery)
- Add a deadline for expert witness rebuttal reports on 1/16/2023 (31 days after the date for expert witness disclosures).
- Extend expert witness discovery to 2/15/2023 (30 days after the date for expert witness rebuttal reports).
- Extend dispositive motions to 3/17/2023 (30 days after the close of expert discovery).
- File Joint ADR Report at the close of discovery.
- Pretrial Order due 30 days after a ruling on dispositive motions.
- Or such other dates as may please the Court.

Respectfully submitted,

DATED this 19th day of August, 2022

s/ Jonny Gersten
Jonathan Gersten OSB #191582
Attorney for Plaintiff

DATED this 19th day of August, 2022

s/ Robert Sullivan
Robert E. Sullivan OSB #983539
Attorney for Defendants